

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America
v.
Ceidy SANDOVAL (1996/US)

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Case No. M-21-2677-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 26, 2021 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 USC § 841

Knowingly and Intentionally Possess with Intent to Distribute approximately
3.58 kilograms of Heroin a Schedule I Controlled Substance and 598.8 grams
of Cocaine a Schedule II Controlled Substance.

21 USC § 952

Knowingly and Intentionally Import a Controlled Substance / Approximately
3.58 Kilograms of Heroin, 598.8 grams of Cocaine.

This criminal complaint is based on these facts:

See Attachment "A"

Continued on the attached sheet.

Complaint authorized by: AUSA Sarina Dipiazza

/S/ Aaron Guerrero

Complainant's signature

Submitted by reliable electronic means, sworn to
and attested to telephonically per Fed. R. Cr. 4.1,
and probable cause found on:

Aaron Guerrero, HSI Special Agent

Printed name and title

Date: 12/26/2021 3:29 PM


Judge's signature

City and state: _____

McAllen, Texas

Nadia S. Medrano, U.S. Magistrate Judge

Printed name and title

Attachment "A"

I, Aaron Guerrero, am a Special Agent of the United States Homeland Security Investigations (HSI) and have knowledge of the following facts. The facts related in this attachment do not reflect the totality of information known to me or other agents/officers, merely the amount needed to establish probable cause.

1. On December 26, 2021, Ceidy SANDOVAL(hereinafter SANDOVAL), a citizen of the United States, entered the United States through the Hidalgo Port of Entry (POE) in Hidalgo, Texas from Mexico. SANDOVAL was a passenger in a commercial passenger bus.
2. After primary inspection Customs and Border Protection Officers (CBPOs) referred SANDOVAL to a secondary inspection. During secondary inspection of SANDOVAL's luggage, consisting of a suitcase and upright rolling duffel bag, a CBPO noticed tampering in the inner lining of her two (2) luggage pieces.
3. A physical search of the luggage revealed, 4 vacuum sealed packages hidden behind the luggage's inner lining. One of the packages weighing approximately 598.8 grams contained a substance that was field tested by CBPOs. The substance was presumptive positive for the properties and characteristics of cocaine. The other three packages weighed in total approximately 3.58 kilograms and it contained a substance that was field tested by CBPOs. The substance was presumptive positive for the properties and characteristics of heroin.
4. A Homeland Security Investigations (HSI), Special Agent (SA) responded to the Hidalgo POE to assist in the investigation. The HSI SA and a HSI Task Force Officer (TFO) / CBPO interviewed SANDOVAL, who stated she was living in Michoacan , Mexico with some relatives since June of 2021 and had met with an individual in Mexico who provided the luggage bags and instructed her to travel to Atlanta, Georgia. Once in Atlanta, SANDOVAL was to give the luggage bags to an unknown individual in Atlanta. SANDOVAL stated that she was going to be paid \$3,000.00 United States Dollars (USD) and travel expenses to deliver the luggage bags and later retrieve them from the unknown individual loaded with approximately \$10,000.00 USD in bulk currency. SANDOVAL was asked if she believed that being paid \$3,000.00 USD to transport \$10,000.00 USD from the United States to Mexico seemed excessive. SANDOVAL agreed that it did appear to be a large payment and that made her believe that the luggage contained something bad, possibly narcotics. SANDOVAL stated that she did not want to ask the individual in Mexico any questions about the luggage bags or its possible contents to avoid any problems.